

*subject to retention agreements*

<p>Attorney or Party Name, Address, Telephone &amp; FAX Nos., State Bar No. &amp; Email Address</p> <p>Eloise K. Hahn, party 313 East 1300 North Chesterton, IN 46304 (219) 628-5481 eloisehahn313@gmail.com</p> <p>Steven A. Leahey, Esquire 150 N. Michigan Av Suite 1120 Chicago, IL 60601 (312)664-6649</p> <p>Attorney for: Plaintiff</p>	<p>FOR COURT USE ONLY</p> <div data-bbox="974 231 1404 514" style="border: 2px solid black; padding: 10px; text-align: center;"> <p><b>RICHMOND DIVISION</b></p> <p><b>FILED</b> <b>SEP 24 2020</b> <b>FILED</b></p> <p><b>CLERK</b> <b>U.S. BANKRUPTCY COURT</b></p> </div>
<p><b>UNITED STATES BANKRUPTCY COURT</b></p>	
<p>In re: Thomas Alan Minor and Renee Scott Minor</p>	<p>CASE NO.: 10-30161-KLP ADVERSARY NO.: 20-03129-KLP CHAPTER: 7</p>
<p style="text-align: right;">Debtor(s).</p>  <p>Eloise K. Hahn</p>   <p style="text-align: right;">Plaintiff(s).</p> <p style="text-align: center;">vs.</p> <p>Thomas Alan Minor et.al.</p>  <p style="text-align: right;">Defendant(s).</p>	<p style="text-align: center;"><b>APPLICATION OF NON-RESIDENT ATTORNEY TO APPEAR IN A SPECIFIC CASE [LBR 2090-1(b)]</b></p>

1. I, Steven A. Leahey, apply to the court under LBR 2090-1(b) for permission to appear and participate in the above-entitled action on behalf of the following named party, by whom I have been retained (*specify name of party*):

Eloise K. Hahn, plaintiff

2. I have paid the required fee specified in LBR 2090-1(b)(5) to the United States Bankruptcy Court and have attached a copy of the receipt.

3. I am a lawyer with the following law firm (*specify name and address of law firm*):  
Steven A. Leahey, Attorney @ Law
4. I am a member in good standing and eligible to practice before the following courts and admitted to practice on the following dates (*specify name of each such jurisdiction and my date of admission to practice in each such jurisdiction*):
5. I am not a resident of, nor am I regularly employed, engaged in business, professional or other activities in the state of \_\_\_\_\_ I am not currently suspended or disbarred in any court.
6. I have concurrently or within the past 36 months made pro hac vice applications to this court in the following actions:

Court	Case Number	Title of Action	Date of Application	Disposition of Application

7. I ☐ have ☐ have not been disciplined by any court or administrative body ☐ disciplinary proceedings are pending; details are as follows:

I ☐ resigned ☐ did not resign while disciplinary proceedings were pending.

8. I certify that I have read the LBRs, the FRBP, the F.R.Civ.P., and the F.R.Evid., in their entirety.
9. I designate the following person of the following law firm, who is a member of the bar of this court and maintains an office in this district for the practice of law, as the attorney with whom the court and opposing counsel may readily communicate regarding the conduct of this case, and upon whom papers may be served:

Name of attorney (Designee):

Roy Terry, Esquire

Name and address of law firm, or residence address:

Roy Terry, Esquire

Telephone number of law firm: (804) 370-2866

10. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature of applicant

\_\_\_\_\_  
Printed name of applicant

**CONSENT OF DESIGNEE**

I consent to the foregoing designation.

Date: 9/24/20

Eloise K. Hahn  
Signature of Designee

Eloise K. Hahn  
Printed name of Designee

*The subject designations are contingent  
on retention agreements in bankruptcy  
court. I have not received any  
agreement to date, therefore, all  
responses to the complaint should  
be directed to my attorney.*

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

A true and correct copy of the foregoing document entitled: **APPLICATION OF NON-RESIDENT ATTORNEY TO APPEAR IN A SPECIFIC CASE [LBR 2090-1(b)]** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) \_\_\_\_\_, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (date) 9/24/20, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

*see attached*

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

9/24/20  
Date

Eloise Hahn  
Printed Name

Eloise Hahn  
Signature

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.



CHESTERTON  
1070 S CALUMET RD  
CHESTERTON, IN 46304-9998  
(800)275-8777

09/23/2020 03:36 PM

Product	Qty	Unit Price	Price
PM Express 1-Day	1		\$26.35
Flat Rate Env			
Richmond, VA 23219			
Flat Rate			
Signature Waiver			
Scheduled Delivery Date			
Thursday 09/24/2020 12:00 PM			
Money Back Guarantee			
Tracking #:			
EJ450083834US			
Insurance			\$0.00
Up to \$100.00 included			
Total			\$26.35
US Flag Bklt/20	1	\$11.00	\$11.00
Total			\$11.00

Grand Total: \$37.35

Debit Card Remitted \$37.35  
Card Name: MasterCard  
Account #:XXXXXXXXXX4422  
Approval #  
Transaction #:543  
Receipt #:025020  
Debit Card Purchase:\$37.35  
Cash Back:\$0.00  
AID:A0000000042203 Chip  
AL:Debit  
PIN:Verified Debit

\*\*\*\*\*  
Due to limited transportation  
availability as a result of  
nationwide COVID-19 impacts  
package delivery times may be  
extended. Priority Mail Express®  
service will not change.  
\*\*\*\*\*

In a hurry? Self-service kiosks offer  
quick and easy check-out. Any Retail  
Associate can show you how.

Save this receipt as evidence of  
insurance. For information on filing  
an insurance claim go to  
<https://www.usps.com/help/claims.htm>

Text your tracking number to 28777  
(2USPS) to get the latest status.  
Standard Message and Data rates may  
apply. You may also visit [www.usps.com](http://www.usps.com)  
USPS Tracking or call 1-800-222-1811.

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Track your Packages  
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[www.informedelivery.com](http://www.informedelivery.com)



CHESTERTON  
1070 S CALUMET RD  
CHESTERTON, IN 46304-9998  
(800)275-8777

09/23/2020 03:16 PM

Product	Qty	Unit Price	Price
MadeofHearts	2	\$0.55	\$1.10
Total			\$1.10

First-Class Mail® 1 \$1.40  
Large Envelope  
Chicago, IL 60601  
Weight:0 Lb 3.00 Oz  
Estimated Delivery Date  
Saturday 09/26/2020

Total \$1.40

Money Order \$350.00  
Serial#:26615257918  
Money Order Fee \$1.25  
Total \$351.25

Grand Total: \$353.75

Cash \$350.00  
Debit Card Remitted \$3.75  
Card Name:MasterCard  
Account #:XXXXXXXXXX4422  
Approval #  
Transaction #:539  
Receipt #:025016  
Debit Card Purchase:\$3.75  
Cash Back:\$0.00  
AID:A0000000042203 Chip  
AL:Debit  
PIN:Verified Debit

\*\*\*\*\*  
Due to limited transportation  
availability as a result of  
nationwide COVID-19 impacts  
package delivery times may be  
extended. Priority Mail Express®  
service will not change.  
\*\*\*\*\*

In a hurry? Self-service kiosks offer  
quick and easy check-out. Any Retail  
Associate can show you how.

Preview your Mail  
Track your Packages  
Sign up for FREE ®  
[www.informedelivery.com](http://www.informedelivery.com)

All sales final on stamps and postage.  
Refunds for guaranteed services only.  
Thank you for your business.

Tell us about your experience.  
Go to:  
<https://postalexperience.com/Pos>  
840-5460-0131-001-00045-19865-01  
or scan this code with your mobile  
device,



UNITED STATES POSTAL SERVICE		CUSTOMER'S RECEIPT	
SEE BACK OF THIS RECEIPT FOR IMPORTANT CLAIM INFORMATION	Pay to	United States Bankruptcy Court	
	Address	701 E. Broad St., Ste 800 Richmond, VA 23219	
NOT NEGOTIABLE	Serial Number	Post Office	Clerk
	266J5257918	2020-09-23	18
		Amount	\$350.00

I, Eloise Kathleen Hahn, do hereby certify that I prepared my adversary criminal through direction of counsel. I am requesting representation for the conference call scheduled 11/10/20 at 9:30 a.m. eastern time Judge Phillips Courtroom, Room 5100, Richmond, VA 23219. All responses from defendants should be directed to my attention at my personal residential address as documented on page 1.

I, Eloise Kathleen Hahn, do hereby certify that I mailed a copy of this document to the following parties, including a copy of my USPS money order receipt, no 26615257918, federally expressed to the bankruptcy court on September 23, 2020 with noontime arrival time on September 24, 2020, being:

United States Bankruptcy Court  
Attn: William Redden, Clerk of the Court  
701 E. Broad St.  
Room 4000  
Richmond, VA 23219

Judge Keith L. Phillips - Courtroom  
United States Bankruptcy Court  
701 E. Broad St.  
Room 5100  
Richmond, VA 23219

Rudolph C. McCollum, Jr.  
McCollum @ Law PC  
PO Box 4595  
Richmond, VA 23220

Kutak Rock LLP  
Attn: Peter Barrett, Esq.  
901 E. Byrd St.  
Suite 1000  
Richmond, VA 23219-4071

McGuire & Woods  
Gateway Plaza



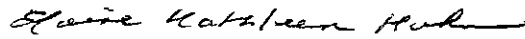
800 E. Canal St.  
Richmond, VA 23219

United States Dept. of Justice  
Attn: Michael Haungs, Esquire  
Attn: John Schumann, Esquire  
Tax Division, Appellate Section  
P.O. Box 502  
Washington, D.C. 20044

Steve Leahey, Esquire, pending retainer agreement nothing final  
150 N. Michigan Av  
Suite 1120  
Chicago, IL 60601

Roy Terry, Esquire, pending retainer agreement nothing final  
The Terry Law Firm  
2711 Buford Rd.  
Ste 170  
North Chesterfield, VA 23235

September 24, 2020

  
Eloise Kathleen Huhon

United States Bankruptcy Court  
Eastern District of Virginia  
Richmond Division

In re:  
Thomas Alan Minor and Renee Scott Minor

Case Number 10-30161-KLP  
Chapter 7  
Adversary Proceeding Number 20-03129-KLP  
Judge Keith L. Phillips

Debtor(s)  
Eloise K Hahn

*related to bankruptcy*

Plaintiff(s)

*requesting assistance*

V.

Thomas Alan Minor et al.

Defendant(s)

To: Eloise K Hahn

**NOTICE OF DEFICIENT FILING**

Upon authority of Local Bankruptcy Rule 5005-1, the documents submitted by you

I - Adversary case 20-03129. Complaint against Thomas Alan Minor, U. S. Trust Bank of America Private Wealth Management, Commissioner of the IRS filed by Eloise K Hahn. (Attachments: # 1 Amended Proof of Claim 1-2 # 2 Amended Proof of Claim 1-3) Nature of Suit: (62 (Dischargeability - 523(a)(2), false pretenses, false representation, actual fraud)) Associated Bankruptcy Case Number: 3:10-bk-30161 (Smith, Linda)

contain certain deficiencies as set forth below. You must correct the deficiencies on or before 9/29/20. Failure to timely correct the deficiencies may result in the pleading or other paper *being stricken from the record or, if a complaint is deficient, the adversary proceeding being dismissed.*

**REPRESENTATION AND APPEARANCES:**

- the ECF registered participant attorney filing the document does not match the attorney's signature on the document.
- **Requirement of Counsel:** filed on behalf of an entity not a natural person acting on own behalf and not signed by counsel permitted to appear under LBR 2090-1. [See LBR 9010-1]
- **Identification of Attorney:** State Bar number omitted from document/proposed order. [See LBR 5005-1(C)(5) and 9022-1(A)]
- a written application for *pro hac vice* admission must be appended to the motion filed by a member of the Bar of this Court. [See LBR 2090-1(E)(2)(a)]

**REQUIREMENT OF FORM:**

- **Legibility:** not in compliance with LBR 5005-1(C)(1)
- **Caption, Official Forms:** [See LBR 5005-1(C)(2)] Every paper must bear the debtor(s) name, the case number and chapter of the case to which it pertains and be in substantial compliance with the current Official Form. *If applicable,* Case name and/or number do not match on paper submitted.
- Not on acceptable form approved by Court for use in Eastern District of Virginia pursuant to Local Bankruptcy Rule 3015-2(A).
- **Signature Required:** not signed by counsel of record, or individual, if *pro se*.
  - *if corporation*, not signed by counsel. [See LBR 5005-1(C)(4)]
  - *if amendment to petition, lists or \*schedules*, not verified by unsworn declaration with original signature of all debtors and, if required, the original signature of the attorney. [See FRBP 1008]
  - *if document submitted in electronically filed case*, signature not indicated with the party's name and/or attorney's name typed in full on the signature line, e.g. /s/ Jane Doe. [See CM/ECF Policy Statement 8.B., Form of Signature of Attorney User and Non-Attorney User.]
- Document does not appear to be complete. Please review this filing for possible error and relate any amendment/correction to the original document.
- Document does not match the event entry used for docketing. Please review this filing and redocket using the correct event entry or redocket to attach the correct document.
- Document appears to be filed in the wrong case. Please review this filing and docket to the correct case.
- **XX** Document does not include a certification whether an Attorney assisted with the preparation of the document. [See LBR 2090-1]
- \*Amended schedules do not include Form 106Dec - Declaration About an Individual Debtor's Schedules, or Form 106Dec is not signed.

Date: September 15, 2020

Clerk, United States Bankruptcy Court

By /s/ Suzan Ramirez-Lowe, Deputy Clerk  
Direct Dial Telephone No. 804-916-2421

{defntcvNov2019.jsp}

**United States Bankruptcy Court**  
**Eastern District of Virginia**  
Richmond Division

**Case Number** 10-30161-KLP  
**Chapter** 7  
**Adversary Proceeding Number** 20-03129-KLP  
**Judge** Keith L. Phillips

**In re:**  
Thomas Alan Minor and Renee Scott Minor

Debtor(s)

Eloise K Hahn

Plaintiff(s)

V.

Thomas Alan Minor et al.

Defendant(s)

**SUMMONS AND NOTICE IN AN ADVERSARY PROCEEDING**

YOU ARE SUMMONED and required to submit a motion or answer to the complaint which is attached to this summons to the Clerk of the Bankruptcy Court within 30 days after the date of issuance of this summons, except that the United States and its offices and agencies shall file a motion or answer to the complaint within 35 days. **Motion or Answer is due by 10/15/2020; IRS - 10/20/20**. If you make a motion, your time to answer is governed by Fed.R.Bankr.P. 7012.

ADDRESS OF CLERK:	William C. Redden United States Bankruptcy Court 701 East Broad Street Richmond, VA 23219
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At the same time, you must also serve a copy of the motion or answer upon the plaintiff's attorney.

NAME AND ADDRESS OF PLAINTIFF'S ATTORNEY:	Eloise K Hahn 313 E. 1300 N. Chesterton, IN 46304
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YOU ARE NOTIFIED that a pretrial conference of the proceeding commenced by the filing of the complaint will be held at the following time and place:

ADDRESS:	Judge Phillips' - Courtroom, U. S. Bankruptcy Court, 701 E. Broad St., Rm. 5100, Richmond, VA 23219
DATE AND TIME:	11/10/20 at 09:30 AM

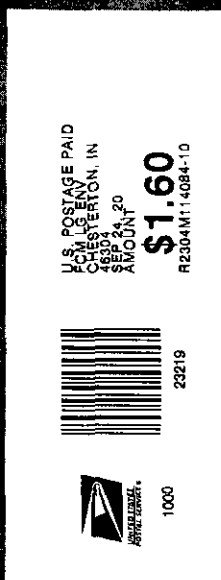
IF YOU FAIL TO RESPOND TO THIS SUMMONS, YOUR FAILURE WILL BE DEEMED TO BE YOUR CONSENT TO ENTRY OF A JUDGMENT BY THE BANKRUPTCY COURT AND JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

Date: September 15, 2020

WILLIAM C. REDDEN, CLERK OF COURT  
By /s/ Suzan Ramirez-Lowe  
Deputy Clerk



*[Note: It is the responsibility of counsel for the plaintiff/movant to advise the Court of any settlement or any other valid reason that a Court scheduled pretrial conference, hearing or trial need not be conducted. Counsel are advised to provide the Court with such notification as far in advance of any such conference, hearing or trial as is practical under the circumstances. Failure of such counsel to properly and timely notify the Court may result in the imposition of sanctions. Local Bankruptcy Rule 9013-1(O)].*



1000

6 Harkins

313 E. 1000 N.

46034

46034

HARKINS